

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

MUCHMORE'S CAFE, LLC,

X

Civil Action No. 14-cv-5668 RRM-RER

Plaintiff,

-against-

CITY OF NEW YORK,

Defendant.

X

**NOTICE OF MOTION FOR
JUDGMENT ON THE PLEADINGS**

PLEASE TAKE NOTICE, that upon the annexed Declaration of Andrew Muchmore dated March 27, 2015, the Exhibits thereto, the accompanying Memorandum of Law in Support of Plaintiff's Motion for Judgment on the Pleadings and all the prior pleadings and proceedings heretofore had herein, plaintiff Muchmore's Cafe, LLC will move this Court pursuant to Rule 12(c) of the Federal Rules of Civil Procedure for a judgment declaring the New York City Cabaret Law, N.Y.C. Administrative Code 20-359, *et seq.*, to be unconstitutional under the First and Fourteenth Amendments to the United States Constitution, enjoining its enforcement to the extent it is declared unconstitutional, and for such other and further relief as the Court deems just and proper.

Dated: Brooklyn, New York
March 27, 2015

LAW OFFICE OF ANDREW MUCHMORE
Counsel for Plaintiff

By: /s/ Andrew Muchmore
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